Expedited Timber Supply Review for the Lakes, Prince George and Quesnel Timber Supply Areas

Summary of Public Input

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Northern Interior Forest Region
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Prince George Forest District
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Quesnel Forest District
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Quesnel, BC V2J 3M5

Fort St. James Forest District
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Fort St. James, BC V0J 1PO

Vanderhoof Forest District
Box 190
Vanderhoof, BC V0J 3A0

Nadina Forest District
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Southern Interior Forest Region
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Kamloops, BC V2C 2T7

September 14, 2004

This document summarizes the public input received on the expedited Timber Supply Review for the Lakes, Prince George and Quesnel timber supply areas.

This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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Background

In June 2004, the British Columbia Ministry of Forests completed an assessment of the timber supply attacked or at risk of attack by the mountain pine beetle in the Lakes, Prince George and Quesnel timber supply areas. On June 10, 2004, it released a *Public Discussion Paper* that summarized the findings and invited comments for 30 days, until July 9, 2004. The *Public Discussion Paper* also included an interpretation paper from the ministry's Forest Science Program recommending stewardship principles in the event of a large salvage program.

In accordance with the *Forest Act*, Section 8, and under normal circumstances, the chief forester reviews and determines new allowable annual cuts for each of the province's 37 timber supply areas and 34 tree farm licences at least once every five years. The harvest level decision may be postponed for up to five more years in cases where the chief forester determines that the allowable annual cut would not change significantly, or it may be determined earlier to deal with unusual events.

The factors listed under Section 8 that the chief forester must consider in determining an allowable annual cut include "abnormal infestations in and devastations of, and major salvage programs planned for, timber on the area".

This report summarizes the input received and provided for the chief forester's consideration when he reviewed the allowable annual cuts for the Lakes, Prince George and Quesnel timber supply areas. The first section of this summary outlines the public review process implemented by the Ministry of Forests, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Ministry of Forests office in Victoria.

Public Review Process and Response

Staff from the five forest districts in the three timber supply areas as well as the Northern Interior and Southern Interior regional offices actively solicited public input through the following actions:

- Copies of the *Public Discussion Paper* were mailed to stakeholders including First Nations, licensees, local governments, environmental groups, and Land and Resource Management Plan participants. Meetings or presentations were offered.
- The *Public Discussion Paper* was made available at the five district offices and two regional offices.
- Advertisements were placed in seven local newspapers, advising the public of the availability of the documents for review.
- A news release was issued and copies of all the documents were made available to the local media.
- Referrals were made to the Ministry of Forests website where documents were available to download.
- Twenty-eight First Nations communities received the public discussion paper, and 10 provided comments related to issues that included economic development, capacity building, cultural concerns and the environment.

The chief forester received 26 submissions to the *Public Discussion Paper* and stewardship interpretation paper (see Appendix 1).

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Public Input

This section summarizes public input received in response to the *Public Discussion Paper* and the accompanying interpretation paper, Forest Stewardship in the Context of Large-Scale Salvage Operations, prepared by the Forest Science Program of the Ministry of Forests.

Public Discussion Paper

Increasing the harvest
A number of submissions say harvest levels should increase while others say there appears to be a bias toward an increase even though this has failed to control the outbreak.

In supporting an increase, Ainsworth Lumber Co. Ltd. (Ainsworth) calls for a licensing arrangement similar to the former pulpwood agreement to provide the flexibility to strategically deploy harvesting as the epidemic spreads across and within TSAs.

The District of Fort St. James says that if harvest levels increase in neighbouring districts, they should also increase in the Fort St. James area to encourage local investment, something that is especially important as mill centralization and rationalization continues. The district supports an increase now, saying it will take time to attract and develop new investment.

North Cariboo Share Our Resources notes that the AAC will decrease in future due to the infestation, and an increase now would provide short-term employment, increase government revenue, recover value from beetle-killed trees, reduce the risk of massive wildfires, allow prompt reforestation and create opportunities for new industries.

Several individuals agree with this view. One submission says common sense suggests beetle-killed wood should be used before it burns. Another says the opportunity to control the beetle has been lost because the time for discussion has been overextended – it is time for the Ministry of Forests to listen to its trained experts.

One individual who supports an increase says that while the discussion paper is sensitive to many issues it does not adequately address the issue of spatial dispersion and operability. The individual suggests a greater emphasis on modelling resource values to address tactical issues and to test the robustness of the plans and assumptions that lie behind the analysis.

Another individual says the increase could theoretically be as much as desired because the dead wood is not growing stock so there would be little impact on the mid-term timber supply.

Submissions expressing concern about an increase include a joint paper from the Sierra Club, BC Chapter, The David Suzuki Foundation and the Fraser Headwaters Alliance (Sierra Club). The groups say they have serious concerns about the implications of the proposed increases related to both the timber supply forecast and the forest stewardship proposal.

Individual submissions that oppose an increase offer a number of views, including:

- The AAC should be reduced immediately to the long-term sustainable rate; harvesting to manage the pine beetle outbreak is a fallacy – the only reason to review harvest levels is a potential short-term economic burst.
- There seems to be a bias toward increasing harvest to control the outbreak yet this approach has failed in the past.
- Will the level of cut proposed be sustainable in the short term – the next 70 years or so?

One individual disagrees strongly with increasing the AAC and says that forests must be managed according to the limits set by nature and not according to perceptions of waste and efficiency.

Concentrate on beetle-killed wood
A number of submissions say that any increased harvest should be directed specifically at wood affected by beetles, and many called for clear

criteria to identify salvage targets.

The Sierra Club says the stewardship interpretation paper fails to acknowledge that clear criteria are necessary for what type of trees can be harvested to ensure excessive cutting of live timber does not occur.

Babine Forest Products Company (Babine) says the timber supply review must accurately report on the available timber supply in the three timber supply areas and meet government's responsibility to reduce the short- and long-term impact of the beetle outbreak. It says that harvesting as much beetle-killed timber as possible will maximize the value of this timber and return these sites to the productive land base.

Babine says the current AAC in the Lakes timber supply area is not being fully harvested, and there must be a process to ensure that any increase is directed toward trees damaged or killed by beetles. It says the discussion paper and AAC rationale should address how any increase is to be allocated.

Babine also notes that the Lakes TSA is the smallest of the three involved, and suggests amalgamating the Lakes and Morice TSAs, both managed by Nadina Forest District, so licensees from the Morice TSA could salvage timber in the Lakes TSA.

Several individuals say the increase is justified only if the infected portion of the harvest is nearing 100 per cent. One says a successful salvage operation should be guided by very clear criteria for what kinds of stands are candidates for salvage.

One submission says scalers are reporting that green unattacked pine and spruce volume is being harvested, and suggests there will be confusion unless the ministry and industry use the existing AAC to maximize cut in attacked stands. Another notes that industry may be reluctant to harvest heavily attacked stands unless there is a profit motivator or government direction.

One individual says the AAC should remain at or near the long-run sustained yield by allowing a haul differential to mills that are a distance from the outbreak so harvest can be transferred from green trees to dead trees. The individual included a letter sent to the Minister of Forests.

Abnormal infestation

The Sierra Club says the chief forester has not adequately argued that the infestation is abnormal under Section 8(e) of the *Forest Act*. It says the timber supply analysis should be based on the range of natural variability, (RONV) often cited as the best option for assessing biological activities and their relationship to ecosystem integrity. The submission says: "Although the current outbreak is larger in its spatial extent and rate of spread than previous outbreaks in the Interior, without more information on historical variation in the temporal and spatial characteristics of beetle outbreaks, it is difficult to determine whether the extent of this outbreak is unnatural (i.e., outside the RONV) or not."

Prescribed burning

Submissions from the Sierra Club and an individual point to prescribed burning as a management tool for the infestation.

The individual says a proposed harvest increase assumes the infestation spread is beyond control and suggests that the most important strategies – changes in fire suppression and large-scale prescribed burns – have not been adopted. The individual also says fire suppression has accelerated the spread and recommends that the Ministry of Forests redraft a forest management plan to allow natural fires to burn and, as a transition phase, use prescribed burns to restore the forest to a semi-natural state.

The Sierra Club says prescribed burning should be re-introduced as a management tool for beetle control, the maintenance of ecosystem integrity and a reforestation technique. It adds

that this needs to be balanced with the volume harvested in a given landscape so the cumulative impact of burning and logging is within the spatial and temporal range of natural variation of landscape change.

Manufacturing capacity
A number of submissions identify the need to ensure there is manufacturing capacity to handle any increase harvest.

Ainsworth says major expansions in manufacturing capacity are needed if non-recoverable losses are to be significantly reduced, with longer-term commitments and licensing arrangement to justify larger investments. Babine says government needs to promote establishment of facilities that use low-grade sawlogs and pulpwood, and work with existing facilities to increase production.

An individual representing a company in one of the timber supply areas lists potential uses for the wood and potential for wood treatment facilities to preserve the shelf-life of beetle-killed wood. A woodlot owner says the government's recent solicitation for expressions of interest must be acted on quickly.

One individual says encouraging new businesses based on an AAC that is above the sustainable level will create a problem when the wood runs out.

Shelf life
Ainsworth says a review confirms sawlogs have a shelf life of five years and that initial studies show that the shelf life for use in OSB could be longer than 12 years. The company says evaluations using fibre from pine that has been dead for 20 years shows OSB can be produced using beetle-killed timber exclusively although process adjustments are needed to maintain environmental and product standards.

Babine says the focus should be to harvest as much wood within its economic shelf life, and develop manufacturing facilities/products that can economically use dead wood beyond the expected shelf life. There is a time limit on the economic value of the dead timber so there should be no AAC limit placed on harvesting it, and it should not be part of the growing stock to be used in future timber supply analysis.

An individual recommends underwater storage in large lakes in the region of higher-quality timber nearing the end of its fifth year, with retrieval by the bundle as markets become favourable.

Quesnel pine partition
C&C Wood Products Ltd. (C&C) says damaged pine in the Quesnel timber supply area pine partition on mesic or drier sites is deteriorating at a slower rate, and could be usable for up to 20 years. It says the existing partition should be increased significantly but not overwhelmingly, and should be maintained to ensure the smaller profiles are utilized and reforested. The company requests a review regarding a partition uplift proportional with that in the regular sawlog portion of the timber supply area.

Harvesting in the Interior Cedar-Hemlock zone
In its submission, T.R.C. Cedar Limited says the establishment of a long-term, sustainable AAC in the Interior Cedar-Hemlock zone has not been clearly stated or emphasized in the past, likely due to a focus on looper salvage and the fact it was not know if the resource could be effectively utilized. TRC says it believes it is time now to move from a looper-damaged salvage focus (dead stands) to sustainable forest management for the long term (green stands).

Log grading/timber pricing
Several submissions discuss the need to look at log grading and timber pricing.

Ainsworth says the success of an accelerated harvest will be governed by log grading and timber pricing mechanisms envisioned for non-sawlog timber.

Babine says any changes to the pricing and scaling of grade 3 (dry sawlog) may affect government's ability to use the millions of cubic metres of dead wood in the three timber supply areas. It says the process of making more dead wood available for timber harvesting may be nullified if the government makes changes to the current interior log grade system.

Comments in a number of individual submissions refer to stumpage, including:

- $0.25 a cubic metre is a very low price for good dry pine logs.
- Industry will likely demand lower stumpage rates for infected stands.
- Relaxing stumpage charges will ensure beetle stands without significant spruce understory are harvested, which will be especially important in three to five years for alternative uses to conventional sawlog harvesting or when the sawlog market is overloaded due to insufficient mill capacity.
- Blue-stained lumber sells for full value in retail stores so the minimum stumpage should increase to $5 a cubic metre, with half of the additional revenue allocated to help small resource-dependent communities diversify their economies and half to hire more staff to enforce wildlife regulations since there would be increased access.

Other management comments

C&C says it has been harvesting beetle attack pine partitions in the Quesnel TSA for almost four years, and field staff are regularly seeing trees as young as 30 years riddled with beetles.

An individual calls for a voluntary citizen watch so trees showing signs of infestation can be removed, more information on how to protect healthy trees in yards and scientific research on a compound that has the same impact as cold weather

First Nations

The Nadleh Whut'en Indian Band says issues related to their forest licence in the Vanderhoof Forest District must be addressed before any decision is made in regards to the expedited timber supply review. The submission also says the Nadleh Whut'en should be given first priority for the allocation of wood within their territory if there is an increase in the allowable annual cut.

The Sierra Club says the chief forester should assess how current and projected harvest levels will affect aboriginal rights and First Nations potential for economic development. It calls for an examination of the Crown's potential liability for compensating First Nations or its ability to include a land base with adequate forest cover as part of a treaty settlement.

Socio-economic factors

The District of Fort St. James says government should invest in strategies to help offset future AAC decreases, such as assessing intensive silviculture opportunities, revisiting forest management decisions such as greenup and adjacency rules, harvest priority ages.

The Sierra Club says the chief forester has not considered the long-term social and economic implications of the proposed increased, as is required under Section 8. It says the province has not addressed the threat of serious social upheaval in the communities most affected, and that proposed increases will create severe fluctuations in available timber supply in the short term. It cites the 2001 Rogers report to say this is contrary to the wishes of the communities.

The Sierra Club submission notes that the Central Interior economy is extremely vulnerable to changes in the forest sector, and unsustainable harvesting will cause severe fluctuations in harvest levels.

One individual says potential effects of the increased logging on other sectors of the economy are not provided, and another says every effort must be made to provide opportunities for northern communities through meaningful partnership with government and/or industry and investment initiatives.

An individual submission says there is a fundamental assumption that increasing the allowable annual cut would bring an economic benefit, but no analysis is presented. The individual said there is no need to rush and suggested allocating a year for input from the public, scientific community and economists.

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Several individuals point to the importance of identifying a market for any increased harvest before the wood is cut. Comments include:

- If the intended market is not clear in advance, the trees will be cut and the wood will have little or no value, leading to a negative impact on the forest industry, other sectors of the economy and the environment.
- A sudden increase in the supply of timber will result in lower market value.

A submission from a woodlot owner says log values continue to erode despite excellent lumber and pulp markets, and additional quota to major licensees, B.C. Timber Sales or First Nations will be at the expense of small tenure and private land holders. He says many woodlots are being wiped out and non-susceptible species will need to be left untouched because of the current over-harvest. Proposed expansion of these woodlots would benefit the local economy and the viability of the woodlot program.

Long-term forecasts

One submission says that since the forecasts do not attempt to project the possible timber supply impacts beyond this summer's beetle flight, they mean little given the scope of the infestation. Another individual says the timber supply projections are relatively uninformative as they do not account for the beetle after 2004.

Stewardship Paper

Most submissions comment specifically on the forest stewardship interpretation paper that accompanied the *Public Discussion Paper*, and the environmental implications of large-scale salvage harvesting. Several question whether government will be guided by the recommendations in the paper.

Stewardship paper content

The Sierra Club says the stewardship paper highlights a number of concerns about large-scale salvage operations but does not address these risks. It says the long-term effects of clearcutting, especially at the scale being proposed, may have permanent negative impacts on the ecosystem.

The submission recommends that the implications of such dramatic increases in cut, and the effects this may have on ecosystem recovery and productivity, should be studied and incorporated into a recovery strategy. It further recommends a study on the effects of two successive disturbances and their implications for biodiversity, habitat and productivity recovery that should be built into the model.

An individual submission says the only criterion addressed directly in the stewardship paper is whether an increase would significantly affect the timber supply yet the big uncertainties are the environmental consequences. The individual says the paper gives no guidance and he suggests there is too little information to comment on the balance struck with regard to key values at stake.

Environmental considerations

Ainsworth says there is no need to harvest within areas such as land use plan protected areas or riparian reserve zones. It says the stewardship provisions recommended in the discussion paper are reasonable as strategic guidelines for operations.

Comments in individual submissions about environmental implications include:

- A quantitative discussion of the environmental impact of the current and proposed total AAC is justified since the proposed AAC puts the harvest at roughly twice the sustainable rate. Questions should include the impact on local climates, whether the forests will be susceptible to invasive

species, the impact of replanting the forests with different species and the anticipated impact on fish and wildlife.

- The Ministry of Forests must attempt to assess the potential effects of the combined effects of large-scale salvage and the outbreak. "What are potential combined effects? A permanent large-scale change in the forest ecosystem?"
- Salvage logging in areas where there have been fires subjects the forest to three disturbance events in rapid succession. There will be a severe impact on wildlife even with measures such as larger wildlife tree patches.

Ecosystem recovery

The Sierra Club says the forest stewardship paper does not adequately address the silvicultural strategies to prevent such outbreaks from occurring in the future. It says the paper advocates large openings in the absence of any substantive structural retention objectives.

The submission says that in areas of infestation, mixed harvest regimes should be applied to create and maintain a variety of stand structures with a focus on patch retention systems that enhance landscape heterogeneity without compromising ecosystem productivity or connectivity.

It says large-scale clearcutting (1,000 hectare openings) will almost inevitably lead to another outbreak in the future. Stands with low or moderate beetle mortality, large live and dead trees, nesting cavities, mixed coniferous composition, multi-layered stand structure, or moist cool climates are good candidates for retention.

The Sierra Club recommends:

- Retention targets should be informed by the best available science to ensure ecosystem integrity and recovery.
- Silvicultural implications of this outbreak should be assessed from a prevention perspective and regulations should be then formulated to ensure that the maximum amount of precaution in relation to future outbreaks is taken.

An individual cites the observations of a Burns Lake forester with significant field experience who feels pine stands with significant spruce understory should not be harvested; that the understory crop could mitigate falldown. The individual says parts of Tweedsmuir Provincial Park are greening up with a pine snag overstory and spruce understory. The same individual says the amount of pine planted should not exceed the amount logged, which may mean relaxing greenup guidelines.

Ainsworth says the enhanced productivity of well-managed pine stands is well documented, and ingress of natural regeneration is more relevant to a non-salvage option than an increased harvest option.

There is little uncertainty regarding the expected response of managed pine stands than would emanate from an increased harvesting option. Ainsworth suggests that retrospective ingress studies are a research gap for government, regardless of the harvesting rate increase anticipated.

Regulating harvest increase

The Sierra Club says it is not clear how the effects of increased harvest rates will be regulated and monitored. Traditional licensing mechanisms that regulate harvest based on live timber would not apply to salvage. It suggests:

- Licence arrangements need to be adjusted to accommodate salvage cutting on an area basis.
- Non-pine species should be removed from the timber supply analysis and be reserved from harvest. Prescriptive regulations around tree removal should be implemented to ensure higher-level objectives are met and high-grading does not occur.
- Pricing for non-pine species and non-infested timber needs to be accurate to ensure the maximum level of return to the Crown.

- Long-term monitoring of both the ecological and the socio-economic impacts on communities need to be undertaken by the proper authority.

One individual says the harvest should be increased only if it the Ministry of Forests is given increased funds to monitor and manage the cut, and funds are available for infrastructure and forestry activities.

Integrated resource management considerations

Babine says biodiversity objectives such as seral stage targets for old growth may have to be reassessed in order to harvest dead timber from the best sites. Many higher-level plans for the three timber supply areas were approved before the outbreak and need to be updated.

The Sierra Club says proposed land and resource planning variances continue to put forest values at risk and are occurring in the absence of public and First Nations consultation. It recommends that:

- Local communities and land and resource management plan participants should be involved in any changes to higher-level objectives that accommodate the proposed increase in harvest rates.
- Assessments should be undertaken that calculate the short- and long-term implications of changes to higher-level plan objectives, the implications of which then need to be communicated to communities.

Individual submissions note among other things that:

- The beetles are out of control and it is time to start thinking about protecting other important public values. This means refocusing on higher-level plan objectives, social and community stability and revenue. Large amounts of unsalvaged timber could increase the wildfire hazard and impede regeneration.
- Proposed changes in the *Forest and Range Practices Act* regarding an increase in legacy coarse woody debris and the creation of large openings (more than 1,000 hectares) are not supported by any scientific analysis.
- The stewardship interpretation paper's statement that there should be little to no salvage harvesting outside of the timber harvest land base should be a hard and fast rule rather than a general rule.

Ainsworth says there will be more breakage at beetle salvage sites because of the brittle characteristics of dry wood, reducing the uncertainty of having legacy trees and woody debris on salvage harvesting sites. It encourages government to designate incremental Forest Investment Account funding to develop landscape level strategies to address key conservation values based on the findings of strategic planning pilot projects across B.C.

Individual submissions also question:

- Why government is proposing strategic level initiatives, such as unharvested legacies, that differ from those in land and resource management plans and other strategic level plans.
- Why there would be more constraints in a salvage scenario, especially when there will be large unsalvaged losses.

Landscape level planning

An individual says a landscape harvesting plan would need to be designed to create and use natural fire guards through infected areas, and also address widespread clearcutting, visual objectives, snow pack and watershed integrity, and soil erosion, slope failure concerns.

Fisheries and water resources

Fisheries and Oceans Canada, BC Interior South, supports a management strategy that considers and addresses watershed scale parameters for the protection of fisheries and water resources. Its submission says the infestation presents an opportunity to establish research trials to improve

understanding of the effects of large-scale salvage operations on specific watershed values.

The department says strategies should be identified and applied in the development of management plans, which specifically recommend:

- Implementation, monitoring and reporting (to regulatory agencies and the public) of Interior Watershed Assessment Procedures for affected watersheds.
- Adequate riparian reserve and management zones as required under the Forest Practices Code, as well as for fish streams or streams with significant downstream effects not specified in the code.
- Establishment of "indicator basins" for long-term monitoring to help assess and guide present and future best management decisions.
- Participation of academics and community groups in the development and implementation of an effective monitoring program.

Wildlife
Two individuals focus on the impact salvage harvesting could have on fish and wildlife by increasing forest access – one calls for more fish and wildlife conservation and enforcement and one suggests that the Ministry of Water, Land and Air Protection consider a moratorium on hunting until the salvage harvesting is complete and the forest roads decommissioned. A third individual says care must be taken in areas known to have woodpecker nests since woodpeckers are beetle predators.

Other Comments

Many submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review process
The District of Fort St. James asks for additional consultation if the harvest is increased in the district, especially how the increase is to be allocated and what government is doing to remove any economic impediments to harvesting the uplift.

An individual says 30 days is not enough time to review the public discussion paper given the complexity of the issue and the potential consequences. He says there is no rush because the infected lumber will hold economic value for several years; there likely will not be a significant amount of logging through the summer when the fire danger is high, and previous dramatic increases in the AAC have not slowed the spread.

An individual says people who live and make a living in the working forest other than by logging should be given the same consideration as First Nations, and be consulted about logging priorities, locations and methods.

Government decision making
An individual notes he has grave concern about government decision making on this issue, saying the division of responsibilities over forest management is implicit in the discussion paper. Deliberations are not properly informed if they focus on timber supply rather than the broader framework for forest values.

Appendix 1 — List of submissions received by the Ministry Forests

Submissions received on the Public Discussion Paper and Stewardship Paper

First Nations
Nadleh Whut'en Indian Band

Local government
District of Fort St. James

Federal government
Fisheries and Oceans, BC Interior South

Forest industry
Ainsworth Lumber Co. Ltd.
Babine Forest Products
C&C Wood Products Ltd.
TRC Cedar Ltd.

Consultants
Aspen Ridge Consulting
ScottLyn Contracting

Interest groups
North Cariboo Share Our Resources Society, Quesnel
Joint submission from the Sierra Club of Canada, BC Chapter, David Suzuki Foundation and Fraser Headwaters Alliance

General public
15 individual submissions